



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

B G W S F
1,9,2

OFFICE OF
ENVIRONMENTAL
CLEANUP

SUBJECT: Action Memorandum for the Bremerton MGP Waste Release Site
Emergency Removal Action, Bremerton, Kitsap County,
Washington

FROM: Kathy Parker, On-Scene Coordinator
Emergency Response Unit

THRU: Chris D. Field, Manager *CD Field*
Emergency Response Unit

TO: Daniel D. Opalski, Director
Office of Environmental Cleanup

I. Purpose

The purpose of this memorandum is to document the decision to initiate the emergency removal action described herein for the Bremerton MGP Waste Release Site (Site), Bremerton, Kitsap County, Washington.

II. Site Information

A. Site Description

Site Name:	Bremerton MGP Waste Release Site
Superfund Site ID (SSID):	10JS
NRC Case Number:	N/A
CERCLIS Number:	WAH001002907
Site Location:	1725 Pennsylvania Ave. Bremerton, WA 98310
County:	Kitsap County
Lat/Long:	47.578 North, 122.643 West
Potentially Responsible Parties:	Cascade Natural Gas, Natacha Sesko, Paul and Margaret McConkey
Access:	Unrestricted
NPL Status:	Proposed for listing
Removal Start Date:	October 5, 2010

B. Site Background

1. Removal Site Evaluation

In August 2010, multiple sheen reports near the beachfront and the nearby Port of Washington Narrows marina were investigated by Kitsap County Department of Health (Kitsap Health). On October 4, 2010, Kitsap Health pinpointed the source of the sheens and determined it to be a black oily liquid discharging from a dislocated joint in a cement pipe buried approximately one foot below ground surface (bgs) on the beach due north of the Sesko property. A sample taken of the released material was analyzed by Washington Department of Ecology

USEPA SF



1369199

(WDOE) lab and reported to be consistent with "Coal Tar Creosote," a substance known to be high in Polyaromatic Hydrocarbons (PAHs).

Kitsap Health reported the source of the release to the U.S. Environmental Protection Agency (EPA) on October 4, 2010. EPA's On-Scene Coordinator (OSC) visited the site on October 5, 2010 and collected samples of the oily liquid discharging from the pipe for analysis of its PAH constituents. The preliminary results indicated the liquid contained PAHs.

2. Physical location and Site characteristics

The Site encompasses approximately four acres of industrial property and beachfront. The nearest residents live within a few feet of the Site. The geospatial coordinates of the Site are 47.578 North Latitude, 122.643 West Longitude.

The dislocated pipe joint is approximately sixty feet toward the water from the high water mark. The sediment in the area around the pipe joint and fanning out from the joint laterally and toward the water is visibly contaminated with black oily liquid.

Migratory birds are known to pass through the area.

Port of Washington Narrows marina is within a few hundred yards of the release and has numerous live-aboard tenants. These tenants have occasionally complained of strong odors and headaches.

Lions Park is directly across the Washington Narrows channel from the pipe release. This is a Bremerton City recreational park.

There are no known or identified historical landmarks or cultural structures with historical significance at the Site.

The Suquamish Tribe, a federally recognized Tribe, maintains shellfish beds and fishing areas in usual and accustomed places in the area of Sinclair Inlet adjacent to the Site. Commercial and recreational marine fishermen also harvest in the area.

The contaminated area is un-vegetated, rocky beach sediment under significant tidal influence. The tides have contributed to the spread of the black oily liquid. The pipe joint is only accessible during a low tide less than plus 3.5.

3. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant.

The EPA Region 10 lab analyzed one of the samples the OSC collected at the Site on October 5, 2010 for PAHs and found elevated levels for several PAHs. The analytical results revealed:

Human Health:

Carcinogenic PAH (cPAH) values greater than their corresponding residential soil regional screening levels (RSLs) were detected in the oily liquid released from the pipe. A human health risk assessment performed later determined that the cumulative cancer risk from PAHs detected in the oily waste exceeded 1×10^{-4} . The beach area is not a residential yard, however there is unrestricted access to it and there are children living and going to school in the neighborhood so there is a high probability the beach is used by them. This is further supported by the garbage left on the path down to the beach at the north end of Pennsylvania Avenue. See Table 1.

Preliminary Ecological Risk Assessment:

The same data was compared to ecological screening level benchmarks for sediment. The PAH concentrations were also found to be substantially above ecological screening level benchmarks for sediments indicating marine species having the ability to crawl on and in the beach sediments would be harmed by the release material.

Potential for migration to the surrounding environment

Sheens have been seen moving away from the site on marine waters indicating the Light Non Aqueous Phase Liquid (LNAPL) fraction of the oily liquid is mobile. The tide has also clearly spread the oily liquid laterally on the beach.

III. Threats to Public Health Welfare or the Environment

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

The current conditions at this Site meet the following factors which indicate that the Site is a threat to the public health or welfare or the environment, and a removal action is appropriate under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) , 40 C.F.R. § 300.415(b)(2).

B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

X Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)]:

The elevated concentrations of PAHs found at the Site indicate that a direct contact exposure pathway exists. Single family residences, an apartment, a marina with live-aboard boats, a high school, a community college and commercial businesses are nearby. Exposure to PAHs may result in potential health risks because persons touching the oily liquid containing PAHs may ingest or absorb PAHs through their skin. Continued exposure can result in an increased risk of developing cancer.

X High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)]:

The oily liquid containing high concentrations of PAHs has several phases. The DNAPL phase can migrate down through the sediment and out across the surface of the sediment through wave action. The floating LNAPL phase can move off-site on the surface of the water through tidal action. There is also a soluble phase in which PAHs can move into the water column through tidal action and surface run-off. Human contact can move the oily liquid off-site on people's or pet's feet.

X Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)]:

The Site is under substantial tidal influence and the area of the release is completely covered and then completely exposed during high and low tides. The area to the northwest of the pipe opening is down-hill and the tides appear to have been moving the oily liquid in that direction.

X The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)]:

Due to the emergency nature of the release, no other federal or state response mechanisms were available promptly enough to secure the LNAPL phase of the oily liquid from moving off-site.

IV. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation.

At the time of this removal action the pipe was releasing a black oily liquid to the surrounding beach sediments and marine water. As the tide came in and went out, the oily liquid was spreading vertically and laterally along the beach sediments from the point of release and sheens were moving away from the beach on marine waters. Since the pipe appeared to come from the upland area which used to be the Old Bremerton Gasworks, it was not immediately apparent whether the oversight responsibility for the release belonged to EPA or the USCG. After EPA deployed the boom that is addressed by this removal action, the USCG assumed control of the site and installed a two-level boom to contain both the LNAPL and DNAPL phases of the oily liquid.

2. Removal activities to date:

At the time of this removal action, there were no ongoing removal activities by other government or private parties being performed. After this removal action, the USCG oversaw a cleanup by Cascade Natural Gas which addressed the pipe and oily beach sediments.

3. Enforcement

The adjacent property owners and a previous operator of the Bremerton Gasworks were contacted and notified of the release. Due to the emergency nature of the release, EPA was concerned that the amount of time it would take for the USCG or PRPs to place the boom around the oily release to prevent migration to marine waters would result in a substantial risk of exposure to public

health and welfare and the environment and undertook that step rather than wait. Cost recoveries efforts have been initiated and include initial investigation into the previous owners and operators of the Old Bremerton Gasworks.

B. Removal Actions

1. Removal action description

On October 5, 2010 EPA placed hard boom around the oiled beach area to prevent migration of the oil to marine waters. This action was intended to mitigate the release of PAHs to marine waters.

On October 7, 2010 the USCG visited the Site and determined that the Site was within its Area of Responsibility (AOR) and assumed responsibility for further cleanup actions. EPA acted as a support agency to the USCG. The USCG also assessed the boom and determined that it was not accomplishing the intended purpose of containing the oily liquid due to wave action and the two or three phase character of the oily liquid. The USCG decided to replace the hard boom with a two-level absorbent boom to better control the release of Dense Non-aqueous Phase Liquid (DNAPL) and LNAPL phases from the oily liquid.

Between October 7 and 8, 2010 EPA contractors removed the hard boom placed on October 5, 2010.

This action memo covers work performed up to this point in time. Additional work done at this site after this date for the emergency response to the release of oily material to beach sediment and marine waters from this broken pipe was addressed by the USCG. The scope of this Removal Action Memorandum is only the sample collection and analysis on October 5, 2010 and installation and removal of the EPA hard boom between October 5 and October 8, 2010.

2. Contribution to remedial performance

The placement of the appropriate type of boom would have, to the extent practicable, contributed to the efficient performance of any long-term remedial action at the Site with respect to the release or threatened release of the contaminants of concern. At the time the hard boom was chosen, the physical characteristics of the oily liquid were not known. After the hard boom was in place, it was re-assessed by the USCG and determined that a different boom type would be more effective.

3. ARARs

ARARs for contaminants in sediment, soil, and water will not be met through implementation of this removal action – placement of booms. This is a preliminary action to reduce migration of contaminated plumes. Further response actions will be taken to address ARARs. There are no ARARs for the placement of boom.

4. Project Schedule

The removal action described herein was started on October 5, 2010 and was completed on October 8, 2010.

C. Estimated Costs*

ERRS Contractor costs (staff, travel, equipment)	\$12,000
START Contractor costs (staff, travel, equipment)	\$5,000
Total Removal Project Ceiling	\$17,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties will be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

VI. Expected Change in the Situation Should Action Be Delayed or Not Taken

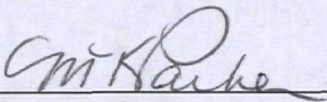
A delay in action or no action at this Site would have increased the actual or potential threats to the public health and/or the environment.

VII. Outstanding Policy Issues

None.

VIII. Approvals

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site. Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action and through this document, I approved the removal action described herein. The total project ceiling is \$17,000, and \$12,000 of this amount will be funded from the Regional removal allowance.

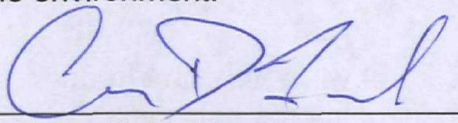


Kathy Parker
Federal On-Scene Coordinator

12/20/2010
Date

**IX. Endangerment Determination under CERCLA Section 106:
Hazardous Substances**

Actual or threatened releases of hazardous substances from this Site may present an imminent and substantial endangerment to public health, welfare, or the environment.



Chris D. Field, Manager
Emergency Response Unit

12/20/10
Date

ROUTING AND TRANSMITTAL SLIP

Date

12/8/2010

TO: (Name, office symbol, room number, building, Agency/ Post)

Initials

Date

1. Elizabeth McKenna

EM

12/9/10

2. Chris Field

CF

12/14

3. Dan Opalski

4.

5.

Action

File

Note and Return

☒ Approval

For Clearance

Per Conversation

As Requested

For Correction

Prepare Reply

Circulate

For Your Information

See Me

Comment

Investigate

Signature

Coordination

Justify

REMARKS

Bremerton Gasworks Action Memo (Oct 2010)

Please return to Kathy after concurrence/
signature for dissemination / pdfing.

12/20/2010 - Chris - revised version attached,
reflects your comments. Need your signature.
Kathy

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/ Post)

Room No. — Bldg.

Kathy Parker

Phone No.

30062

NSN 7540-00-935-5862
5041-103



OPTIONAL FORM 41 (Rev. 1-94)

Prescribed by GSA

UNICOR FPI - SST